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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN RE:

KIMHYO, LLC;

Debtor.

CHAPTER 11

CASE NO. 10-46673 (JHW)

HEARING DATE: January 10, 2011

HEARING TIME: 10:00 a.m.

**NOTICE OF MOTION OF PARKE BANK FOR RELIEF FROM THE AUTOMATIC  
STAY PURSUANT TO § 362(d) OF THE BANKRUPTCY CODE, FOR TURNOVER OF  
RENTS AND PROFITS RECEIVED BY THE DEBTOR FROM MORTGAGED REAL  
PROPERTY, and FOR DISMISSAL**

PLEASE TAKE NOTICE that the undersigned counsel for Parke Bank (the “Bank”) shall appear before the Honorable Judith H. Wizmur, United States Bankruptcy Judge, at the United States Bankruptcy Court, for the District of New Jersey, located at 401 Market Street, Camden, New Jersey 08101 on the 10th day of January, 2011 at 10:00 a.m., or as soon as counsel may be heard, to move for an order granting the Bank relief from the automatic stay pursuant to Section 362(d) of the United States Bankruptcy Code as well as for the immediate turnover of rents and profits from the mortgaged real property, and in the alternative, for dismissal of the within proceeding.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely on the attached certification of James S. Talarico and the Memorandum of Law filed with the Court in support of this Motion.

PLEASE TAKE FURTHER NOTICE that any objection to this Motion must be filed with the Bankruptcy Court and served upon counsel for the Bank on or before seven (7) days prior to the return date set forth above. If no objection is filed, the Motion may be granted as unopposed.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order granting the relief requested by the Bank has been provided to the Court and is attached hereto.

Oral argument is requested if timely opposition is filed.

DEMBO & SALDUTTI, LLP  
COUNSEL FOR PARKE BANK

By: /s/ Anne S. Cantwell  
ANNE S. CANTWELL

Dated: December 14, 2010